

ORIGINAL
RECEIVED

JUN 25 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Federal-State Joint Board on)	CC Docket No. 96-45
Universal Service)	
)	
1998 Biennial Regulatory Review – Streamlined)	CC Docket No. 98-171
Contributor Reporting Requirements Associated)	
with Administration of Telecommunications Relay)	
Service, North American Numbering Plan, Local)	
Number Portability, and Universal Service Support)	
Mechanisms)	
)	
Telecommunications Services for Individuals with)	CC Docket No. 90-571
Hearing and Speech Disabilities, and the)	
Americans with Disabilities Act of 1990)	
)	
Administration of the North American Numbering)	CC Docket No. 92-237
Plan and North American Numbering Plan Cost)	NSD File No. L-00-72
Recovery Contribution Factor and Fund Size)	
)	
Number Resource Optimization)	CC Docket No. 99-200
)	
Telephone Number Portability)	CC Docket No. 95-116

**COMMENTS OF CENTER FOR DIGITAL DEMOCRACY, EDMONT
NEIGHBORHOOD COALITION AND MIGRANT LEGAL ACTION PROGRAM**

The Center for Digital Democracy ("CDD"), Edgemont Neighborhood Coalition and the Migrant Legal Action Program ("CDD, *et al.*" or "Commenters")¹, through undersigned counsel,

¹The Center for Digital Democracy is a Washington, DC-based organization that is dedicated to ensuring that all Americans have access to new interactive technologies. The Edgemont Neighborhood Coalition is a non-profit community organization located in Montgomery County, Ohio. The group is comprised of residents of Edgemont, a low-income African-American neighborhood in Dayton, who operate a community computer center where residents are able to access computer and telecommunications technology. The Edgemont Neighborhood Coalition also works to ensure that its community has access to affordable telecommunications services. The Migrant Legal Action Program is a national advocacy and

hereby submits the following comments in response to the Commission's Notice of Proposed Rulemaking, FCC 01-145, released May 8, 2001. For the purpose of these comments, CDD, *et al.* focuses on the issues delineated in paragraphs 42 and 43, which request comment on carriers' recovery of universal service surcharges through line-item assessments on bills.

CDD, *et al.* are very concerned about the methods that certain carriers, particularly dial-around (10-10) and prepaid calling card carriers, are using to "recoup" the universal service fee assessment. It appears that a number of dial-around and prepaid card providers are adding exorbitant flat-rate universal service fees to certain customers' bills, even when that customer only utilizes the carrier's services once during the billing period. The assessment of such fees is clearly abusive, and should be ended by the Commission.

I. A Number of Dial-Around and Prepaid Card Providers Charge "USF" Fees That Are Exorbitantly High

1. Dial-Around Providers

Since the deregulation of the long-distance telephone market in 1984, dial-around providers have offered consumers an alternative to their presubscribed interexchange carrier ("PIC") that can be utilized on a per-call basis.² As advertising of dial-around services has increased in the last few years, dial-around services have become increasingly popular for

support center located in Washington, DC that has provided legal representation for migrant and seasonal farmworkers since 1970.

²See also *Policy and Rules Concerning the Interstate Interexchange Marketplace*, 15 FCC Rcd. 22321, 22331 (2000) ("Dial around 1+ calls are calls made by accessing the IXC through the IXC's carrier access code (CAC) in the absence of a presubscription agreement with the IXC. A CAC is a five or seven digit access code that enables callers to reach any carrier, presubscribed or otherwise, from any telephone.")

consumers that seek the lowest price long-distance service based on the duration or time of day that a call is placed.³

One of main reasons consumers increasingly use dial-around services is their apparent simplicity in pricing.⁴ Consumers often receive promotional material stating that all calls to a particular destination during a specified time period will only incur a low per-minute fee. Some carriers also offer lower rates for longer duration calls.

Unfortunately, a number of dial-around services add a series of fees and surcharges that can remove much of the apparent pricing simplicity. Over the course of the last year, a number of dial around carriers have begun to add either flat-fee "Universal Service" assessments, or have begun to charge percentage based fees for their Universal Service Fund ("USF") contribution that appear to bear almost no relation to the actual USF contribution factor.⁵ Excel Telecommunications, Inc., for example, adds a flat rate fee of \$1.12 per month when its "1010297" dial-around service is used within a billing cycle, even if the service is only used once.⁶ VarTec Telecom, Inc. adds a \$0.75 fee if its "1010636" dial-around service is used during

³See Sally Deneen, *Cutting Corners*, SUN-SENTINEL (Ft. Lauderdale Fla.), May 15, 2001, at 2E (noting that some consumers have terminated IXC presubscription agreements completely in favor of dial around numbers for all long distance calls).

⁴See Kevin DeMarrais, *Phone Plan? Try to Dial Up Best Deal*, REC. N.N.J., May 13, 2001, at B1 (noting that dial around services often purport to offer rates of 3.9 to 5 cents per minute for interstate calls).

⁵The Second Quarter 2001 Universal Service Contribution Factor is 0.068823. See Common Carrier Bureau Announces No Change in Second Quarter 2001 Universal Service Contribution Factor, DA 01-1196 (rel. May 11, 2001).

⁶See Excel Telecommunications, Inc. Website, available at www.1010297.com/rates.html (attached as Exhibit A) (stating that "[i]n response to increases in the contribution factors for the Federal Universal Service Fund, effective April 1, 2001, the USF charge became \$1.12, based on

a billing cycle, plus an additional 6.9% charge.⁷ Furthermore, many carriers state that these fees are government mandated charges, and do not explain that the USF carrier assessment may currently be recovered by virtually any method that a carrier chooses.

While hidden or exorbitant fees and surcharges harm consumers in almost any transaction, the potential for harm is much higher in the dial-around industry. Many consumers who use dial-around services use those services specifically because they claim to offer low, per-minute pricing. Often, many consumers, particularly immigrants, choose dial around services because they claim to offer low per-minutes rates to specific international destinations. Furthermore, while many consumers presubscribing to interexchange carriers often carefully study that carrier's calling plans and associated fees, consumers looking for low dial-around rates will likely only look at carriers' per-minute rates and their often erroneous promises of "no additional fees."⁸

2. Prepaid Card Providers

A number of abusive USF assessment practices are also occurring in the prepaid calling card industry. Prepaid calling card are often marketed as offering a set amount of calling time to

the change in the FCC contribution factor.").

⁷See VarTec Telecom, Inc. Website, available at www.vartec.net/customer/care/billingfaq.shtml (attached as Exhibit B) (stating that the "fee charged to VarTec Telecom customers is 6.8823% of their total state-to-state and international charges billed by VarTec Telecom in a calendar month plus an additional 75¢ per telephone line per month."). It is also important to note that the first frame in VarTec Telecom, Inc.'s "1010811" web page states that the service offers rates of "5¢" a minute with a "low 50¢ minimum per completed call" and "NO Monthly Fee!" VarTec Telecom, Inc. Website, available at www.vartec.net/fiveline/fiveline.shtml (attached as Exhibit C).

⁸See *id.*

interstate or international destinations for a set price, and are often targeted at poor and minority consumers who do not have local telephone service or are not presubscribed to an interexchange carrier.

While the nature of prepaid calling cards does not allow the assessment of monthly flat "USF" fees, a number of carriers appear to be charging gross revenue fees that substantially exceed the USF contribution factor. For example, Vocall Communications Corp., which markets a prepaid calling card referred to as the "Metrocall Phone Card, " states on its website that a "federally authorized USF surcharge of 7-18% applies to international and interstate calls."⁹

Many of the consumer concerns detailed above in reference to the excessive "USF fees" levied by dial-around services are also analogous to the prepaid card industry, as consumers purchasing prepaid phone cards often expect to receive a set amount of calling time for a set amount of money.¹⁰ The vast majority of these customers do not receive any itemized bill detailing "USF fee" charges, and often have no indication that these fees are being levied other than the fact that they are not receiving the full calling time advertised on the prepaid calling card or associated promotional materials.¹¹

⁹Vocall Communications Corp. Website, available at <http://moneysaver.net/?pk00102> (attached as Exhibit D).

¹⁰See Jennifer Mena, *Prepaid Phone Cards Under Scrutiny as Complaints Increase Commerce*, L.A. TIMES, Jan. 28, 2001, at B3 (noting that prepaid calling cards promising 30 minutes of telephone service often offer only a few minutes of calling time after fees and surcharges are subtracted from the advertised minutes of use).

¹¹See Jill Oestreicher, *Phone Cards Beneficial, But Beware of Hidden Costs*, DES MOINES REG., Aug. 13, 2000, at 5 (noting that very few companies provide a written breakdown for charges incurred through use of prepaid calling cards).

In addition, prepaid calling cards are often marketed to immigrants and economically disadvantaged individuals and households that do not have local telephone service.¹² Many recent immigrants who utilize prepaid calling cards also do not speak English, and are confused by signs advertising low rates in their native language, and the "fine print" detailing fees and surcharges, which is often written in English.¹³ In addition, many immigrants either do not understand the procedures for filing complaints against companies for deceptive marketing practices, or are afraid to file complaints.¹⁴

II. The Commission Should Prohibit Separate USF Recovery By Dial Around and Prepaid Card Providers or, in the Alternative, Only Allow Recovery of the Actual USF Contribution Factor

As stated above, language stating that an exorbitant "USF surcharge" is "federally authorized" falsely gives a consumer the impression that the surcharge is mandated by the Communications Act of 1934, as amended, or the Commission, when it clearly is not. Such language may also serve to undermine support for the USF and the Commission's efforts to preserve universal service efforts through the United States.

CDD, *et al.* believe that the assessment of separate "USF fees" dial around and prepaid calling card provides is inherently confusing to consumers who believe that a dial around service will charge an advertised, set amount for minute of calling time, or that a prepaid calling card

¹²See Henry Gilgoff, *Phone Cards Have Mom Calling Foul*, *NEWSDAY*, Jan. 14, 2001, at F03 (noting that immigrants who call their native countries are one of two major groups that use prepaid calling cards in the United States).

¹³See Mena, *supra* note 9, at B3 (noting that many purchasers of prepaid calling cards do not speak English).

¹⁴See *id.*

will yield a set amount of minutes for a fixed price.¹⁵ Accordingly, CDD, *et al.* urge the Commission to prohibit dial around and prepaid calling card providers from assessing a separate "USF fee" charge, and require dial around and prepaid calling card providers to include the USF assessment as part of the overall per-call or per-unit rate.¹⁶

In the alternative, should the Commission decline to ban the billing of carriers' quarterly USF contribution as a separate charge for dial around and prepaid card services, CDD, *et al.* believes that the Commission should adopt rules limiting carrier recovery of the USF assessment to a percentage of billed interstate and international charges that correlates to the Commission's quarterly USF contribution factor. A percentage based USF assessment would also eliminate much of the unfairness incurred by one-time users of dial around services or purchasers of low denomination prepaid phone cards who now pay flat per-line or per-account fees that are grossly excessive in comparison to the Commission quarterly USF contribution factor. Furthermore, while the examples of abusive "USF fee" collection practices delineated above illustrate certain

¹⁵CDD, *et al.* note that the Commission, in conjunction with the Federal Trade Commission, has scrutinized the dial around and prepaid calling card industry previously. *See Federal Communications Commission and Federal Trade Commission Issue Joint Policy Statement on Deceptive Advertising of Long Distance Telephone Services*, 2000 WL 232200, rel. Mar. 31, 2000 (stating that pricing information "should be disclosed in a clear and conspicuous manner, and without distracting elements so that consumers can understand it, and make fully informed choices"). To the extent that many carriers do not even list their "USF fees" on promotional materials advertising low per-minute rates, CDD, *et al.* submits that the imposition of exorbitant "USF fees" is inherently deceptive and misleading.

¹⁶CDD, *et al.* note that Section 254(b)(4) of the Telecommunications Act of 1996 states "[a]ll providers of telecommunications services should make an equitable and nondiscriminatory contribution to the preservation and advancement of universal service." (emphasis added). 47 U.S.C. § 254(b)(4). Accordingly, there is no statutory impediment to prohibiting the "pass-through" of a carrier's USF contribution factor on dial around and prepaid calling card services.

practices in the dial around and prepaid card industries, a broad based rule covering all carriers would also eliminate any abusive billing practices by presubscribed interexchange carriers as well.¹⁷

Furthermore, to the extent that the Commission allows dial around and prepaid card providers to bill the USF assessment as a separate line item, CDD, *et al.* also generally supports the Commission's proposal to require standardized language for the description of the USF fee surcharge. CDD, *et al.* suggest, however, that the Commission describe the line item on end-user customer bills as "Carrier Recovery of Federal Universal Service Charge," rather than "Federal Universal Service Charge" to more accurately reflect the fact that the USF fee is assessed on carriers, and not the actual end user.¹⁸

¹⁷See Telephony, COMM. DAILY, June 21, 2001, at 8 (noting that WorldCom recently raised its universal service fee for long distance service subscribers from 9.9% to 12%).

¹⁸See *supra* note 16.

CONCLUSION

The Commission should take strong action to prohibit the deceptive and misleading marketing practices of certain dial around and prepaid phone card companies. Accordingly, the Commission should prohibit the separate assessment of "USF fees" by dial around services and prepaid phone card companies in order to eliminate consumer confusion and potentially deceptive marketing practices or, in the alternative, only allow these companies to pass through the actual quarterly USF fee assessment authorized by the Commission.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "CR Day", with a long horizontal line extending to the right.

Christopher R. Day
Angela J. Campbell
Institute for Public Representation
Georgetown University Law Center
600 New Jersey Avenue, NW, Suite 312
Washington, DC 20001
(202) 662-9535

Counsel for CDD, *et al.*

Dated: June 25, 2001

[CLOSE](#)

– **Exhibit A**

What is the Universal Service Fund Fee?

IMPORTANT INFORMATION FOR OUR 10-10-297 LONG
DISTANCE CUSTOMERS

You may already be familiar with Universal Service Fund (USF) charges that have been appearing on your bill. As a result of the Telecommunications Act of 1996, all telephone companies are required to contribute to the government mandated USF fund, which was created to help ensure affordable telephone service to schools, libraries, rural health care facilities and similar groups. Telephone companies are permitted to charge USF fees as a way to recoup this cost of providing its customers with phone service.

In response to increases in the contribution factors for the Federal Universal Service Fund, effective April 1, 2001 the USF charge became \$1.12, based on the change in the FCC contribution factor.

We appreciate your business. If you have any questions, Customer Care is available 24 hours a day, 7 days a week: 1-800-962-4631.

[[TOP](#) | [CLOSE](#)]

Excel Telecommunications, Inc.

Exhibit B**BILLING Q & A**

- Contact Information
- Why doesn't VarTec Telecom bill all 1+ calls?
- I thought there was no \$5 monthly fee!
- What is the MISC. charge?
- What is the Federal USF charge?
- What is the State USF charge?
- What is a COCOT charge?
- I was billed by the wrong company!
- Am I billed for incomplete calls?
- Why are there calls to DeSoto or Dallas TX?
- Why are there calls to 800-383-2255?
- What if I don't recognize some calls?

Dialing Q & A
Services Q & A

VarTec Telecom contracts through local telephone companies to provide our long distance service charges within your monthly telephone bill. Some basic service providers may not contract with us for these services, although service may be available for use. If service is available in the area, VarTec Telecom may provide a "direct bill" program for that area. Contact your Customer Care Associate to determine which billing plan is available for your area.

Billing: 1-800-583-8811
VarTec Telecom
Attn: Direct Billing
P.O. Box 921
Dallas, TX 75235

Billing Frequently Asked Questions:

Q: Why are some 1+ calls billed through VarTec Telecom and others are not?

A: Toll and long distance calls within your state, which are charged by your local phone company are referred to as "intraLATA" calls. You may dial-around or bypass your local phone company's charges by dialing a 10-10-### access code (such as VarTec Telecom's 10-10-811) to take advantage of a specific carrier's rates. In addition, some local phone companies also offer "intraLATA 1+" service choices. This service allows you to choose a different carrier and their rate, for intraLATA or interLATA calls. Contact your local phone company or your VarTec Telecom Customer Care Associate for information and assistance.

Q: I have been dialing 10-10-811 for several months. Last month I changed my long distance carrier to VarTec Telecom, and now I have a \$5 fee. You said there were no monthly fees.

A: When you change your primary long distance carrier, the local telephone company will charge a switching fee for the change. (This fee should be about \$5). If this is a new phone service, the local phone company should waive the switching fee for the first 60 days. This fee is not a VarTec Telecom fee and should be listed under the local phone company's charges. If you find a fee listed under VarTec Telecom's charges, call your Customer Care Associate to confirm which service/rate your billing telephone number is subscribed to.

Q: What is the MISC. Charge on my phone bill?

A: Depending on the format your telephone company uses for printing

their bills, if your service has a monthly OR access fee, those charges may appear on your bill as a **"MISC"** charge.

Q: What is the Federal USF Reimbursement charge?

A: "USF" stands for "Universal Service Fund." The federal Universal Service Fund was established by the Federal Communications Commission (FCC) to subsidize rural and high cost telephone funding and telecommunication services for schools, libraries, and rural health care providers. The fee associated with the USF is mandatory for many telecommunications service providers, including VarTec Telecom. As a result, VarTec Telecom passes the cost through to its customers, rather than adjusting its per minute rates to accommodate for its payment into the Federal Universal Service Fund. The fee charged to VarTec Telecom customers is 6.8823% of their total state-to-state and international charges billed by VarTec Telecom in a calendar month plus an additional 75¢ per telephone line per month. This charge only applies to customers who have made state-to-state and/or international calls during the billing cycle. Since part of this fee is percentage based, a customer's USF fee may vary from month-to-month, as his/her long distance calling patterns change.

Q: What are the state specific USF or similar funds listed on my bill?

A: In addition to the Federal USF, many states have established similar state-specific universal service funds to pay for access to certain intrastate telecommunications services. The fees associated with these state funds are mandatory for VarTec Telecom as well as many other telecommunications service providers. In some states, these state fund fees are to be passed through to customers, and in others, the telecommunications service providers may elect to pass through these charges to the customers. State fees (including USF charges and other governmental fees) are passed on to VarTec Telecom customers as a line item charge on their bill. These state fees are based on a percentage of the in-state charges billed by VarTec Telecom in a calendar month, so a customer's state fees may vary from month-to-month as his/her long distance calling patterns change.

Note: In addition to the fees noted above, customers will be billed applicable taxes and fees as mandated by various governmental authorities (e.g., E911/Poison Control fees, excise taxes, etc.)

Q: What is a "COCOT" surcharge?

A: Independent pay-phone companies charge a Customer Owned Coin Operated Telephone (COCOT) surcharge when you dial an 800 number from their pay phones. If you use a Travel Card, Home Direct, or 800 Service which is accessed by dialing an 800 number, the COCOT surcharge will be included in the cost of your call to cover the FCC mandated payments to the payphone providers.

Q: I dialed 10-10-811 and was billed by another company or I dialed another company's 10-10-### and was billed by VarTec Telecom!

A: These types of errors may be due to misdialing numbers. However, if many calls are billed to the wrong carrier, this may indicate a translation error at the local phone company's switching equipment. Please report the error immediately to your local service provider and/or the long distance provider you were attempting to access. If you were incorrectly billed by VarTec Telecom when attempting to use another carrier, please contact your customer care associate.

Q: Am I billed for calls that are not completed?

A: No. VarTec Telecom does not bill for calls that are not completed. However, if a call is intercepted by an answering machine, voice mail, a fax machine, or cellular phone intercept messages, those calls are considered to be connected, and you will be charged for them. Please note, however, some calls to apartment complexes, boarding/fraternity houses, dormitories, or military installations, which are serviced by a PBX, may send an "answered" signal to VarTec Telecom, resulting in a charge for those calls. Other calls that may show up as "answered" may

be the result of antiquated telephone equipment at the terminating end.

Q: I don't know anybody in DeSoto or Dallas, Texas and charges to a number there are on my bill!







A: Charges for calls using the "Home Direct" or other 800-call-home services will appear on your bill as calls to DeSoto or Dallas, TX even though they terminate to your home or office.

Q: No one in my house knows anyone at 800-333-2255 and there are charges for it on my bill. I thought 800 numbers were free.

A: Calls to 800 numbers are free to the caller. 800-383-2255 is the 800 access number for the "Travel Card" service. Calls charged to a Travel Card will appear itemized on your phone bill as being made **from** the 800 number to the number called with the Travel Card.

Q: What if I don't recognize some calls that are on my phone bill?

A: When calls to unrecognized numbers/cities appear on your phone bill, run a mental check list of the following:

-  Have you recently acquired a new phone number and/or service? If a phone number has recently been assigned to a new customer, charges from the previous customer's bill may show up on your bill. Also, some people do not cancel their calling card accounts with other carriers, and those charges will continue to be assigned to the billing telephone number designated for that calling card. Call your local phone company or long distance provider to adjust those charges on your bill.
-  Do you know someone who lives in that state, but not that city? Often a local phone company's terminating equipment is located in a neighboring city. Calls will appear on the bill as terminating to the city in which the equipment is located, rather than the city of the phone number you're calling.
-  Have you recently had friends or family visiting? Sometimes visitors may call numbers without realizing they are a toll or long distance call. Or, they may intend to tell you about the call and just forget to do so during the visit.
-  Has someone you know or someone you don't talk to very often moved, had a birthday/anniversary, or suffered an illness or loss?
-  Have you or someone in your household responded to an advertisement for a service or product from television, a magazine, or a mailer?
-  Have you or someone in your household been shopping for insurance or a new home, vehicle, appliances, or furniture?

These are easy to forget, since the call may have been a month or more ago depending on your local phone company's billing cycle. If you are not able to determine who has made these calls, please contact our Customer Care Center. Associates are available to help you 24 hours a day, 365 days a year.

[Return to Customer Care](#)

[Home](#) | [Products & Services](#) | [Customer Care](#) | [Employment Opportunities](#)

[Business Opportunities](#) | [About Us](#) | [Contact Us](#) | [Legal Notices](#)

Copyright ©2001 VarTec Telecom, Inc.

Exhibit C**RESIDENTIAL PRODUCTS****FIVE LINE™
10-10-811™****Only 5¢ Per Minute**
Low 50¢ Minimum Per Completed Call

- NO Monthly Fee!
- Only 5¢ Per Minute.
- Low 50¢ Minimum Per Completed Call.
- Available 24 Hours A Day, 7 Days A week!
- No Need To Change Your Existing Carrier.

Stay in touch for less with one of the best values in long distance today for both **state-to-state AND in-state** calls. Just dial 10-10-811 + 1 + the area code and number and see the savings for yourself.

International Rates[International Rates](#)[International Rates Comparison](#)**Long Distance Rates**[Rate Comparisons](#)

All new 10-10-811 users will automatically receive the FiveLine service rates. Any current 10-10-811 users who prefer to change their existing VarTec Telecom® service to FiveLine may do so by calling the FiveLine center at 1-800-264-7328.

Notice: Rates are not inclusive of governmental taxes and fees, including the Universal Service Fund and similar state funds. Subject to service availability. Service not available in Hawaii or Alaska.

[Business Products](#)[Home](#) | [Products & Services](#) | [Customer Care](#) | [Employment Opportunities](#)[Business Opportunities](#) | [About Us](#) | [Contact Us](#) | [Legal Notices](#)

Copyright ©2001 VarTec Telecom, Inc.

All rights reserved.

Exhibit D

Per Call Connection Charge of *49c on all calls within the US; ***\$1.00, ^\$1.25, ^\$1.50, or ^^\$2.00 per International call (depending on country called) applies. A 50c surcharge applies to calls placed from payphones (except emergency or TRS calls). A lower charge may apply to intrastate calls placed from payphones. A federally authorized USF surcharge of 7-18% applies to international and interstate calls. State USF surcharges may apply to intrastate calls in applicable states. Domestic and International rates vary based on state and country called. Calls terminating at wireless receivers, in certain overseas countries, will be charged at higher rate. Federal, state and local taxes may apply. 25c Service Fee applies weekly after initial use. All calls are billed in one minute increments. Application of surcharges and fees has effect of reducing total minutes on card. Services are provided by Vocall Communications Corp., subject to terms and conditions of its federal and state tariffs. cards are not renewable. The provider is not responsible for lost or stolen cards.

Expiration Date : 3 months after first use, or 12 months after date of purchase, which ever comes first. All purchases of PINs are final. In the unlikely event of a defective PIN, Cognigen will in no case be responsible for any refund or exchange more than 30 days after purchase.

<http://moneysaver.net/?pk00102>

CERTIFICATE OF SERVICE

I, Angela J. Campbell, hereby certify that I have this 25th day of June, 2001, mailed by First Class mail, postage prepaid, a copy of the "Comments of the Center for Digital Democracy, Edgemont Neighborhood Coalition and Migrant Legal Action Program to the following:

The Honorable Michael K. Powell, Chairman*
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554


The Honorable Gloria Tristani*
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

The Honorable Kathleen Q. Abernathy*
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

The Honorable Michael J. Copps*
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Sheryl Todd*
Accounting Policy Division
Common Carrier Bureau
Federal Communications Commission
445 Twelfth Street, SW, Room 5-B540
Washington, DC 20554

Paul Garnett*
Accounting Policy Division
Common Carrier Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554


Angela J. Campbell

* Hand Delivered